

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Keith R. Murphy
Tatiana Markel

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SUSAN SCHEMEN FRADIN REVOCABLE
AGREEMENT OF TRUST DATED 5/23/2000
and

SUSAN SCHEMEN FRADIN, individually, as
beneficiary and as trustee of the Susan Schemen
Fradin Revocable Agreement of Trust Dated
5/23/2000,

Adv. Pro. No. 10-04525 (SMB)

Defendants.

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including September 6, 2016.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: July 8, 2016

/s/Keith R. Murphy

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehand@bakerlaw.com

Keith R. Murphy

Email: kmurphy@bakerlaw.com

Tatiana Markel

Email: tmarkel@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

/s/Andrew Hanrahan

Willkie Farr & Gallagher LLP

787 7th Avenue

New York, NY 10019

Telephone: (212) 728-8203

Facsimile: (212) 728-9203

Joseph T. Baio

Email: jbaio@wilkie.com

Andrew Hanrahan

Email: ahanrahan@wilkie.com

*Attorneys for SUSAN SCHEMEN FRADIN
REVOCABLE AGREEMENT OF TRUST
DATED 5/23/2000 and SUSAN SCHEMEN
FRADIN, individually, as beneficiary and as
trustee of the Susan Schemen Fradin
Revocable Agreement of Trust Dated
5/23/2000,*